

Patrick J. Neligan, Jr.
State Bar. No. 14866000
Douglas J. Buncher
State Bar No. 03342700
John D. Gaither
State Bar No. 24055516
NELIGAN LLP
325 North St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: 214-840-5333
Facsimile: 214-840-5301
pneligan@neliganlaw.com
dbuncher@neliganlaw.com
jgaither@neliganlaw.com

PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-__
	§	
DEBTORS¹	§	Joint Administration Requested

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING TO BE HELD ON JANUARY 20, 2021**

National Rifle Association of American and Sea Girt LLC (the "Debtors") may call the following witnesses and introduce the following exhibits at the hearing scheduled on January 20, 2021 at 2:00 p.m. in the above-captioned proceeding (the "Hearing"):

I. WITNESSES

1. The Debtor reserves the right to call the following individual as witnesses at the Hearing:
 - a. Shawne E. Soto
 - b. Robert G. Owens
 - c. Sonya B. Rowling

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

- d. Any witness(es) identified or called by any other parties; and
- e. Rebuttal witnesses, as necessary.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following document as an exhibit at the Hearing:

Exhibit No.	Description
1	Declaration of Shawne E. Soto in Support of Certain First Day Motions [Docket No. 10]
2	Declaration of Robert G. Owens in Support of Certain First Day Motions [Docket No. 11]
3	Declaration of Sonya B. Rowling in Support of Certain First Day Motions [Docket No. 12]

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: January 19, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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pneligan@neliganlaw.com

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Texas State Bar No. 03342700

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Texas Bar No. 24055516

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NELIGAN LLP

325 N. St. Paul, Suite 3600

Dallas, Texas 75201

Telephone: (214) 840-5300

Facsimile: (214) 840-5301

PROPOSED FOR THE DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of January 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither

John D. Gaither